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*Counsel for Plaintiffs and the Putative Classes*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**JONATHAN HOANG TO; JEFFRY HEISE;**  
and **JOSEPH MULL**, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

**DIRECTTOU, LLC; and ALLIANCE**  
**ENTERTAINMENT, LLC**, Delaware Limited  
Liability Companies,

Defendants.

Case No. 3:24-CV-06447-WHO

**[PROPOSED] ORDER GRANTING  
MOTION TO APPOINT  
HAMMONDLAW, P.C. AND HEDIN  
LLP AS INTERIM CO-LEAD CLASS  
COUNSEL**

Judge: Hon. William H. Orrick  
Courtroom: 2 – 17th Floor  
Hearing Date: April 9, 2025  
Hearing Time: 2:00 p.m.

1 Before the Court is Plaintiffs' Motion for Appointment of HammondLaw P.C. and Hedin L.L.P.  
2 as Interim Co-lead Class Counsel. Having considered the submissions of the parties, the arguments  
3 made at the hearing, and the relevant law, Plaintiffs' motion is GRANTED. The Court APPOINTS  
4 HammondLaw P.C. and Hedin LLP as Interim Co-lead Class Counsel.

5 Fed. R. Civ. P. 23(g)(1)(B) provides the following factors for the Court to consider: (i) the work  
6 counsel has done in identifying or investigating potential claims in the action; (ii) counsel's experience  
7 in handling class actions, other complex litigation, and the types of claims asserted in the action; (iii)  
8 counsel's knowledge of the applicable law; (iv) the resources that counsel will commit to representing  
9 the class; and (v) any other matter pertinent to counsel's ability to fairly and adequately represent the  
10 interests of the class.

11 Each of these factors favor the appointment of HammondLaw and Hedin LLP as Interim Co-  
12 Lead Class Counsel. HammondLaw and Hedin LLP have done substantial original work identifying and  
13 investigating potential claims in the action. *See* Fed. R. Civ. P. 23(g)(1)(A)(i). HammondLaw and Hedin  
14 LLP have significant levels of experience handling class actions and claims of the type asserted in this  
15 case. *See* Fed. R. Civ. P. 23(g)(1)(A)(ii); Fed R. Civ. P. 23(g)(1)(A)(iii). HammondLaw and Hedin LLP  
16 have sufficient resources to vigorously litigate on behalf of the putative classes, as has been  
17 demonstrated by prior cases that both firms have successfully litigated on a contingency basis. Fed. R.  
18 Civ. P. 23(g)(1)(A)(iv). Finally, HammondLaw and Hedin LLP will effectively and efficiently represent  
19 the putative classes and are committed to ensuring that a diverse set of attorneys work on this matter.  
20 *See* Fed. R. Civ. P. 23(g)(1)(B). For all these reasons, **IT IS HEREBY ORDERED THAT:**

21 1. Pursuant to Federal Rule of Civil Procedure 23(g)(3), the Court appoints HammondLaw  
22 and Hedin LLP as Interim Co-Lead Class Counsel.

23 2. Interim Co-Lead Class Counsel shall be responsible for the overall conduct of the  
24 litigation, shall be generally responsible for coordinating the activities of the putative classes, and shall

1 have the sole authority to:

2 a. determine and present to the court and opposing parties the position of the  
3 putative classes on all matters arising during the proceedings;

4 b. coordinate the conduct of discovery on behalf of the putative classes consistent  
5 with the requirements of Federal Rule of Civil Procedure 26, including the preparation of joint  
6 interrogatories, requests for production of documents, requests for admission, and the examination of  
7 witnesses in depositions;

8 c. conduct settlement negotiations on behalf of the putative classes;

9 d. consult with and employ experts and consultants as necessary;

10 e. enter into stipulations with opposing counsel as necessary for the conduct of the  
11 litigation;

12 f. maintain adequate time records covering services rendered as Interim Co-Lead  
13 Class Counsel; and

14 g. perform all other duties as may be proper.

15 h. This order shall apply to all class actions related, transferred, or coordinated to  
16 the above-captioned action.

17  
18 IT IS SO ORDERED.

19 Dated: \_\_\_\_\_

\_\_\_\_\_  
William H. Orrick  
United States District Judge